



Team Name:

“Snowman Builders: Let the Avalanche Start”

Multi-Permit Design & Reduced Permit Framework Design

November 30 – December 4, 2015



The Opportunity

Catharine Fitzsimmons, Bureau Chief
DNR Air Quality Division

The “Snowman Builders: Let the Avalanche Start” Team

David Miller

- Cory Carr, 3M
- Mick Durham,
Grain Processing Corp
- Mark Mathias, Monsanto Co.
- Terry Noteboom, Pella Corp
- Lain Pacini,
Stanley Consultants Inc.
- Julie Vande Hoef,
Office of the Governor
- David Miller, DNR
- Shawn Corbin, DNR
- Gary Smith, DNR
- Peter Zayudis, DNR
- Danjin Zulic, DNR
- Sarah Piziali, DNR



Facilitators: Kevin Wright and
Susan Godwin, DHS

Scope of “Multi-Emission Pt. Permit” Event

David Miller

Create a new permit format allowing the option for multi-emission point permitting.

Objectives

David Miller

1. Identify and integrate efficiencies created with the new permitting option that apply to the existing permit options;
2. Identify key strategies and resources for assuring customer awareness of available permit options;
3. Capture opportunities to simplify the application process;
4. Determine how applications for permits are affected;

Objectives

David Miller

5. Determine how modifications of multi-permits will be completed;
6. Determine how to transition between permitting options;
7. Identify efficiencies to the overall permitting process, as appropriate, to decrease the time required to issue permits; and
8. Streamline, eliminate duplication, and ensure all applicable regulations are reflected in the permit.

What We Developed

Lain Pacini

The CAP – Collection of Air Permits

- A new permit format (CAP) which combines multiple emission points
 - Updated layout (tables, organization, etc.)
- A new application process for facilities that utilize the CAP
 - New construction
 - Transitioning into CAP
 - Modification of a CAP (simple or normal)
- Educational outreach to increase awareness of the CAP
 - FAQs
 - Communication plan
 - Website updates
 - Training

Methodology

Lain Pacini

- Lean Design
- Identified Trends
- Completed a SWOT (Strengths, Weaknesses, Opportunities, Threats)
- Brainstormed
- De-Selected ideas to focus on high impact and relatively low difficulty
- Group Work

SWOT Analysis

Lain Pacini

Strengths:

- Clear what limits, regulations, etc. apply to which emission unit
- Familiarity of permit template – know where to look for information
- Each permit is a standalone document
- Strong permitting staff experience

Opportunities:

- Decrease lead time
- Emphasize important conditions of permit
- Reduce paperwork/paper
- More flexible permitting process

Weaknesses:

- Creates too much paperwork
- No overview of process/group of units
- Permits are static – don't change with regulations
- Multiple permits (similar sources or bubble limits) with conflicting requirements

Threats:

- Increase permit and application complexity
- Lose track of smaller entity inputs
- Conflicts with rule interpretations
- How will modifications changes be tracked in the new permit format

Brainstorming

Mick Durham

Application

- Add checkbox to indicate customer wants to choose a CAP
- Allow applicant the option to draft their permit
- All ranges in fields to accommodate the CAPs

Brainstorming

Mick Durham

Modification

- Develop modification method
- Develop check list for required forms
- Update instructions
- Create simple modification guidelines
- Simple modification procedure

Brainstorming

Mick Durham

Permit Format

- Use current format to begin the process
- Improve efficiency by consolidating requirements
- Unique permit number for each point
- Create new section for processes and facility regulations
- Move unique information to the front of the permit
- Move boiler plate information to the back of the permit
- Add severability clause

Brainstorming

Mick Durham

Communication

- Notify email of options to stakeholders
- Promote use functionality of the CAP
- Create example of the CAP
- Outreach program for training
- Internal Training
- Post FAQs on Website

New Process (CAP Permit)

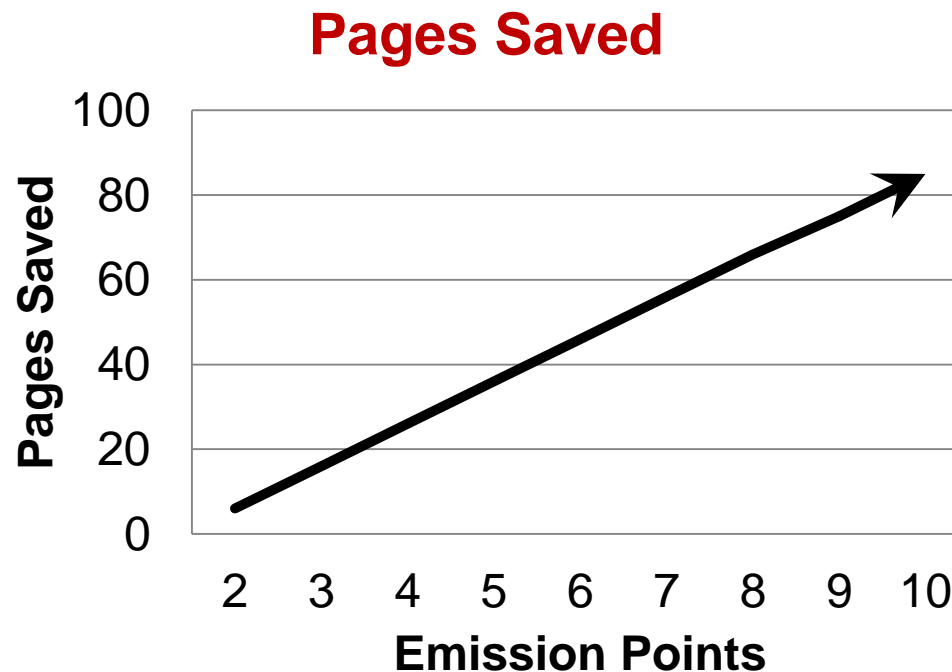
Sarah Piziali

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Potential Savings!!!

Gary Smith

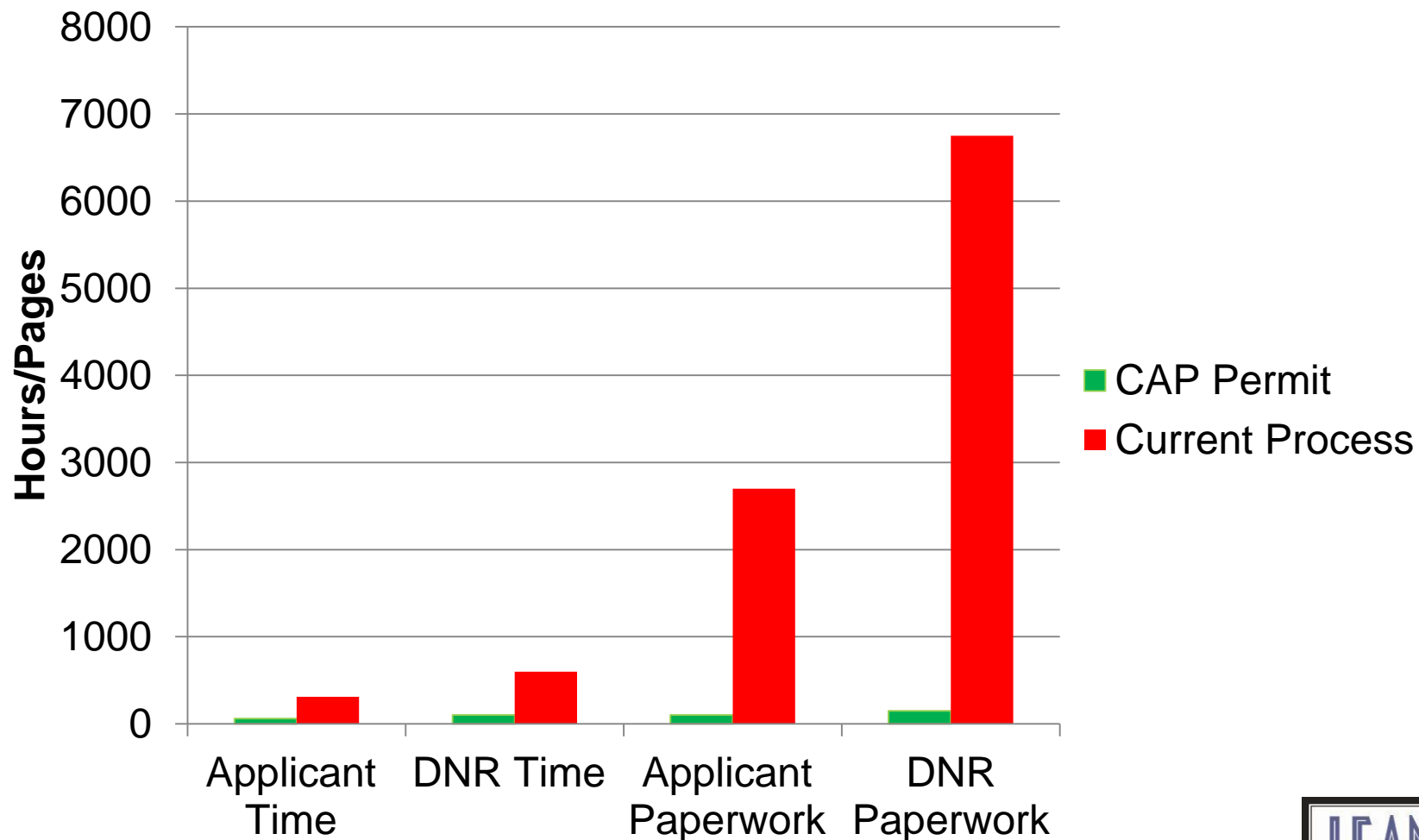
Using the CAP document, the permit length is expected to **REDUCE 6 to 8 pages** per emission point!



Potential Savings

Gary Smith

One process line revised 9 times over 7 years:



Scope 2: Reduce Permit Framework

Peter Zayudis

Scope 2

- Design a permit framework that reduces the length of air construction permits.

Objectives

Peter Zayudis

1. Provide a permit framework that works for all customers that decreases the length of their permit.
2. Identify and integrate efficiencies to the existing permit framework that can be achieved through eliminating text.
3. Capture efficiencies identified during this event to the overall permitting process, as appropriate, to decrease the time required to issue permits.

Objectives

Peter Zayudis

4. Design a permit that can be easily understood by permit holders, inspectors, other stakeholders.

5. Streamline, eliminate duplication, and ensure all applicable regulations are reflected in the permit.

Brainstorming

Mark Mathias

Title Page/Overall Format

- Move permit # to top
- Move Plant # to top
- Add contact email
- Move EP ID permitted equipment
- Create EU table
- A CE to new EU table
- Updated shortened header
- Use first 6 pages of CAP

Brainstorming

Mark Mathias

Title Page/Overall Format

- Possible font type and size, margin revisions; boilerplate 2 pages (front/back)
- Remove any NA sections
- "Location if different if different from above..." page 1
- Remove addresses page 5
- Possibly add table of contents

Brainstorming

Mark Mathias

Revise Conditions

- Combine operating limit and monitoring table or section
- Combine stack testing tables
- Remove unused lines in tables
- Remove CO2 from #10 and #12
- Don't spell out federal regulations
- Tables in landscape

Brainstorming

Mark Mathias

Revise Boilerplate

- Remove section 7
- Move appeal to cover letter; look at language
- Change rule language to citation
- Remove acronyms or use once per project
- Remove D from section 8 or edit/combine DEF

Brainstorming

Mark Mathias

Revise Boilerplate

- Remove 3rd sentence, first paragraph
- Remove section 1
- Remove 2nd paragraph and table section 9
- Remove 3rd paragraph section 2
- Remove section 5

New Permit Template

Shawn Corbin

- A new standard permit template which reduces the length from 9 to 6 pages
 - Updated layout (tables, organization, etc)
- Streamline boilerplate language
 - Reduced from 4 to 3 pages in permit
 - Relocated some boilerplate language to cover letter

Key Points

Julie Vande Hoef

- ✓ DNR and Stakeholders worked together to achieve objectives and goals.
- ✓ Huge potential savings for combined units that are modified frequently.
- ✓ Finalized by January 7th, 2016!
- ✓ Additional items to explore
 - ePermitting
 - Update IAC code to best practices
 - Integrate construction permitting and Title V permitting process (Title V streamlining)
 - Investigate requirements for GHG form/certified mail/permit application signatures
 - Provide engineering evaluations and supporting materials to applicants

Homework

Danjin Zulic

Item	Item Description	Person Responsible	Due Date
1	Develop mock draft CAP permit to use for example	Terry	12/31/15
2	Develop internal procedure for CAP processing	Shawn	1/7/16
3	Appeals in cover letter	Sarah	1/7/16
4	Put acronym list on web	Sarah	1/7/16
5	App forms finalized	Sarah	1/7/16
6	Update GIP permit template	Gary	2/29/16

Wrap Up

Susan Godwin, DHS
Lean Facilitator

Questions & Comments?

